## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

ePLUS INC.,	)
Plaintiff,	) Civil Action No. 3:09-CV-620 (REP)
v.	)
LAWSON SOFTWARE, INC.,	) )
	)
Defendant.	) )

# NOTICE OF FILING UNDER SEAL CORRECTED EXHIBIT 1 TO PLAINTIFF ePLUS, INC.'S MOTION AND SUPPORTING MEMORANDUM FOR LEAVE TO FILE AN OFFER OF PROOF REGARDING ITS DAMAGES CLAIM PURSUANT TO FEDERAL RULE OF EVIDENCE 103 AND 35 U.S.C. § 284

Plaintiff *e*Plus, Inc. ("*e*Plus") hereby gives notice that a Corrected Exhibit 1 to its Motion and Supporting Memorandum for Leave to File an Offer of Proof Regarding Its Damages Claim Pursuant to Federal Rule of Evidence 103 and 35 U.S.C. § 284 has been submitted UNDER SEAL to the Clerk of Court. The exhibit, which was originally submitted to the Clerk on January 12, 2011, was corrected to fix inadvertent formatting issues. No substantive changes have been made to the document.

Dated: January 18, 2011

Respectfully submitted,

ePlus, Inc.

By Counsel

/s/

Henry I. Willett, III (VSB #44655)

Craig T. Merritt (VSB #20281)

**CHRISTIAN & BARTON, LLP** 

909 East Main Street, Suite 1200 Richmond, Virginia 23219-3095

Telephone: (804) 697-4100

Facsimile: (804) 697-4112

hwillett@cblaw.com cmerritt@cblaw.com

Scott L. Robertson (admitted pro hac vice) Jennifer A. Albert (admitted pro hac vice) David M. Young (VSB #35997)

## GOODWIN PROCTER LLP

901 New York Avenue, N.W.

Washington, DC 20001

Telephone: (202) 346-4000

Facsimile: (202) 346-4444

sroberts on@goodwinprocter.com

jalbert@goodwinprocter.com dyoung@goodwinprocter.com

Michael G. Strapp (admitted pro hac vice)

### **GOODWIN PROCTER LLP**

Exchange Place

53 State Street

Boston, MA 02109-2881

Telephone: (617) 570-1000 Facsimile: (617) 523-1231 mstrapp@goodwinprocter.com

Counsel for Plaintiff, ePlus, Inc.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of January, 2011, I will electronically file the foregoing

# NOTICE OF FILING UNDER SEAL CORRECTED EXHIBIT 1 TO PLAINTIFF ePLUS, INC.'S MOTION AND SUPPORTING MEMORANDUM FOR LEAVE TO FILE AN OFFER OF PROOF REGARDING ITS DAMAGES CLAIM PURSUANT TO FEDERAL RULE OF EVIDENCE 103 AND 35 U.S.C. § 284

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

Daniel McDonald, pro hac vice
William D. Schultz, pro hac vice
Rachel C. Hughey, pro hac vice
Andrew Lagatta, pro hac vice
MERCHANT & GOULD
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 332-5300
Facsimile: 612) 332-9081
lawsonservice@merchantgould.com

Robert A. Angle, VSB#37691 Dabney J. Carr, IV, VSB #28679 TROUTMAN SANDERS LLP P.O. Box 1122 Richmond, Virginia 23218-1122 (804) 697-1238 (804) 698-5119 (Fax) robert.angle@troutmansanders.com dabney.carr@troutmansanders.com

### Counsel for Defendant Lawson Software, Inc.

Henry I. Willett, III (VSB #44655) Counsel for Plaintiff *e*Plus, Inc. CHRISTIAN & BARTON, LLP

/s/

909 East Main Street, Suite 1200 Richmond, Virginia 23219-3095 Telephone: (804) 697-4100

Facsimile: (804) 697-4112 hwillett@cblaw.com